

# **EXHIBIT 1**

**Plaintiffs' More Definite Statement as to  
Defendant Islamic African Relief Agency**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.
2. The Islamic African Relief Agency (a/k/a ISRA, IARA, YARA, African Islamic Relief Agency) was founded in 1981 in Khartoum, Sudan
3. The organization is represented in more than 30 countries worldwide, including the United States. The private relief agency is a Sudanese organization and most of its financing is supported by Saudi Arabia.
4. The Islamic American Relief Agency ("IAMRA"), based in the US is a branch of the Islamic Relief Agency ("ISRA"), originally called the Islamic African Relief Agency ("IARA"). In the beginning, the Islamic African Relief Agency appeared as a branch of another Sudanese radical non-profit organization, called Da'wa Islamiya. ISRA split with the Da'wa Organization in the middle of the 1980's.
5. The main office of IAMRA is located at 201 Cherry Street, Suite D (PO Box 7084), Columbia, MO 65205, United States (Telephone: 573-443-0166). The IAMRA is headed by Mubarak Ahmed as President. He formerly lived at the foundation address and currently lives at 4801 Samantha Court, Columbia, MO. IAMRA has other offices in the United States, including Missouri; Baltimore, Maryland; Norman, Oklahoma; and Orlando, Florida.
6. In 1992, IARA received \$10,000 from Defendant Sulaiman al-Ali , a member of the International Islamic Relief Organization, an organization under investigation by the United States government under suspicion of financial and material support of terrorism, specifically al-Qaeda.
7. In the mid-1990s, the USAID entered into cooperative agreements with IARA. These contracts were terminated on December 16, 1999, after the US Department of State provided USAID with information suggesting these agreements were not in the national interests of the US :  
*"In December 1999, two federal grants totalling \$4.2 million dollars from the U.S. Agency for International Development (USAID) to IARA were cut off when the U.S. State Department determined that they were not in America's 'national security interests'."*

8. Ziyad Khaleel a/k/a Ziyad Sadaqa, a student located in Orlando, Florida, and a member of IARA, was detained by Jordanian authorities on December 29, 1999, and indicted under criminal charges of being a "procurement agent" for Usama Bin Laden. Khaleel was a fundraising director for the IARA Missouri branch (main branch) and the former IARA website administrator.
9. The ISRA foundation was managed from Sudan until 1996 by Abdallah Suleyman Al-Awad. According to intelligence and academic sources, ISRA is an umbrella organization founded by the National Islamic Front in Sudan, which sheltered Osama Bin Laden and al-Qaeda operatives from 1991 to 1996. During the Sudanese civil war, ISRA was used by the regime to destabilize countries around Sudan. Thus, after investigations, Ethiopia closed the ISRA offices located on its territory. Uganda officials conducted similar investigations against ISRA in their country under the belief that the charity was conducting illegal Sudanese activities.
10. According to a 1996 memo from the CIA studying radical Islamic charities support for terrorist operations, the Islamic Relief Agency is one of the most active organizations in logistical and financial support for al-Qaeda. According to this source, the ISRA office in Zagreb was controlled by officials of Sudan's ruling party, the National Islamic Front, which supported al-Qaeda members in Sudan from 1991 to 1996.
11. Moreover, while Usama Bin Laden was operating in Sudan, constructing the Tahaddi Road with technical assistance by Defendant the Saudi Bin Laden Group, his own company, Al Hijra, was headed by Muslim activists, particularly from ISRA. This is revealed in the testimony of Jamal Ahmed Al-Fadl during the 2001 trial of the 1998 US Embassy bombings:

*Q. Do you know who ran the Al Hijra Company while it was in the Sudan?*

*A. At the time, few people. The first one Dr. Sharif al Din Ali Mukhtar.*

*Q. Who else?*

*A. Abu Hassan al Sudani, and Abu Hamman Al Saudi, Abu Rida Suri and Abu Hajer.*

12. According to court testimony, Sharif al Din Ali Mukhtar was the head of Al Hijra for Construction and Development. At the same time, Sharif al Din Ali Mukhtar was head of Islamic Relief Agency in Jeddah.
13. In March 1995, Pakistani police arrested six men, four of them foreigners, for alleged connections to a suspect in the 1993 World Trade Center bombing. The two Pakistanis were identified as Fazlullah Hamidi from the south-western province of Baluchistan and Dr Saleem Abdel Rahim, a Syrian-born director of ISRA in Peshawar.
14. The Bosnian Anti-Terrorism Task Force Police Unit headed by Ivica Misic investigated the activities of the Islamic Relief Agency in Sarajevo and Tuzla. Among the five

Islamic NGOs being investigated by the Bosnian Federal Financial Police, the Islamic Relief Agency is noted as a possible past or present conduit for terrorism financing.

15. In addition, according to intelligence documents used in an international symposium on Money Laundering & Terrorism , the Third World Relief Agency ("TWRA"), a charity under investigation for terrorism support, had regular links with Islamic Relief Agency.
16. In the case of TWRA, the foundation was managed by Sudanese diplomat Fatih el Hussanein. According to German Police and Judiciary Report dated 1998, TWRA was used to maintain contact with Usama Bin Laden and Omar Ahmad Ali Abdel Rahman, a co-conspirator in the 1993 World Trade Center bombing.
17. Also according to this document, the Bosnian branch of the Islamic Relief Agency was also linked to the Maktab al-Khidamat organization operated personally by Usama Bin Laden.
18. The Islamic Relief Agency office in Israel was also closed by the Israeli Government in 1996 for providing support to the families of Hamas activists involved in terrorists attacks on Israel. The Charity is still under police investigation after the head of the charity, Sheikh Raid Salah, tried to meet in Qatar with Defendant Yousef Qardawi, the spiritual leader of several Islamic terror organizations in Middle East.
19. In addition, the Irish Security Section of the Gardai (Irish National police) raided the Dublin office of the Islamic Relief Agency in October 2001, under suspicion of terrorist financing. Irish Investigators seized documents, phone numbers and £10,000 in cash from the five houses and the office of the foundation.
20. The Irish Anti-terrorism Unit also found explicit references to Defendant Mustafa Ahmed al-Hawsawi (aka "Mustafa Ahmed," aka "Hashem Abdollahi") in the offices of the Islamic Relief Agency in Dublin. Al-Hawsawi was arrested the March 4, 2003, along with Khalid Shaikh Mohammed and explicitly identified as the chief money handler for the Sept. 11, 2001 attacks.
21. Finally, the Islamic African Relief Agency was listed as a Specially Designated Global Terrorist pursuant to Executive Order 13224 on October 13, 2004 under alleged direct financial support of terrorism, specifically to Usama Bin Laden. Information uncovered by United States government officials indicate that "hundreds of thousands of dollars [were sent] to UBL in 1999" through the offices of the IARA.
22. Having its assets frozen by this U.S. Treasury action, the IARA appealed to the U.S. court system to unfreeze its assets. U.S. District Judge Reggie B. Walton ruled in favor of the Department of the Treasury on September 15, 2005, upholding the agency's decision to freeze the accounts connected to the IARA.